

9 July 2010

Robert Rizzo
Bioenergy Program Manager
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Dear Mr. Rizzo:

You have asked for comments regarding the “Biomass Sustainability and Carbon Policy Study” that Mass DOER commissioned from the Manomet Center.

I speak as a former registered forester in the Commonwealth of Massachusetts, as a licensed professional forester in Maine and as a concerned business owner. Sewall Company has provided services to landowners who control millions of forest acres (primarily in northern New England) and to primary wood-processing mills where vast quantities of wood residuals originate. Sewall has performed wood sourcing studies for most of the biomass energy sector in New England.

Sewall Company does not typically engage in policy matters. We prefer to provide professional advice on forestry matters and try hard to represent the best standard of care in sourcing, analyzing and reporting pertinent facts.

I have read the study and suggest that it requires a period of scientific peer review sufficient to ascertain that scientific truths are properly represented. It also requires the full engagement of stakeholders, both within Massachusetts and, as importantly, beyond the Commonwealth borders, as they will surely be impacted by the conclusions of this study.

The scientific review should be coordinated so that expertise in biometrics, forest economics, engineering and other relevant sciences can have full access to the study’s authors and contributors. The total transparency touted in the 7 July 2010 letter from Secretary Bowles translates to full and open discussion on all scientific conclusions and representations.

The policy implications are more immediately troubling because a virtual cascade of press releases has flooded the media, followed by retractions and “clarifications.” The law of unintended consequences has dealt a blow to the credibility of this study. As importantly, it has broadly castigated current landowners, logging contractors, biomass plant owners and



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operators who now provide hundreds of jobs and valuable commerce to Massachusetts, and every state where biomass is harvested or utilized.

Very strong and urgent leadership is required from the Commonwealth to prevent further damage to the biomass industry, to the many hundreds of people who are directly employed by those companies, and to the future opportunity this resource represents in Massachusetts and New England.

Sincerely,

A handwritten signature in dark ink, appearing to read 'D. T. Edson', written in a cursive style.

David T. Edson, LPF
President